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Attorneys for The British Broadcasting Corporation

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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MARK I. SOKOLOW et al.,	:	04-CV-00397 (GBD)(RE)
	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	DECLARATION OF
	:	<u>ITAI MAYTAL</u>
	:	
THE PALESTINIAN LIBERATION ORGANIZATION,	:	
et al,	:	<u>ECF CASE</u>
Defendants.	:	
	:	
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ITAI MAYTAL declares, pursuant to 28 U.S.C. §1746 as follows:

1. I am an associate in the law firm of Miller Korzenik Sommers LLP, attorneys for The British Broadcasting Corporation (the "BBC"). I am fully familiar with the facts and circumstances herein and make this declaration based on personal knowledge in support of the BBC's motion to quash the Subpoena To Testify at A Deposition In a Civil Action dated August 9, 2011 (the "Subpoena"), directed to it by counsel for the Plaintiffs in this action.
2. That Subpoena seeks testimony and documents related to a 2003 news program broadcast by the BBC entitled "Arafat Investigated" (the "Program") and unpublished materials that include recordings of two Program interviewees.

3. The Complaint in this action seeks damages in connection with seven alleged attacks in or near Jerusalem, Israel in 2001, 2002 and 2004.

4. I have viewed the Program, which was reported by a Middle East correspondent. It is focused on the isolation at that time of former Palestinian leader Yasir Arafat ("Arafat") by Israel and the U.S., and Arafat's status and relationship to the Palestinian people. There were a number of persons interviewed in that program, among them persons who identified themselves, for example, as various officials, academics, militants and/or residents of the area.

5. My review revealed that none of the alleged attacks at issue in this case were subjects of, or mentioned in, the BBC Program, and at least one such alleged attack postdated the 2003 Program.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on September 6, 2011.



Itai Maytal